

**REMARKS**

Claims 13-32 are pending in this application. This Amendment amends the specification, drawings, and claims 13-17 and 19-23 and adds claims 25-32.

The Office Action objects to the drawings as not showing the power supply input filter of claim 19. This Amendment amends FIG. 1 to show power supply input filter 15 and the specification to include reference number 15. Applicants respectfully request withdrawal of this objection.

The Office Action rejects claims 13-24 under 35 USC §112, second paragraph. This Amendment amends claim 13 to obviate the rejection. Applicants respectfully request withdrawal of this rejection

The Claimed Invention

An exemplary embodiment of the invention, as recited by independent claim 13, is directed to a household washing appliance that includes an electronic program controller for controlling rinsing program sequences, the electronic program controller including a programmable control module having an interface for programming at least one rinsing program sequence that can be executed by the program controller and the electronic program controller being configured such that programming thereof can be carried out without dismantling parts of the household appliance.

Another exemplary embodiment of the invention, as recited by new independent claim 27, is directed to a household washing appliance that includes an electronic program controller for controlling program sequences of the washing appliance, the electronic program controller including a programmable control module having an interface for programming at least one program sequence that can be executed by the program controller, wherein the electronic program controller is configured such that programming thereof can be carried out without dismantling parts of the washing appliance, the programmable control module is located adjacent

to the interface, and the programmable control module and the interface are located at a rear wall of the washing appliance.

Another exemplary embodiment of the invention, as recited by new independent claim 31, is directed to a method of programming a household washing appliance, the washing appliance having an electronic program controller for controlling program sequences of the washing appliance, the electronic program controller including a programmable control module having an interface for programming at least one program sequence that can be executed by the program controller, wherein the electronic program controller is configured such that programming thereof can be carried out without dismantling parts of the washing appliance, the programmable control module is located adjacent to the interface, and the programmable control module and the interface are located at a rear wall of the washing appliance. The method includes accessing the interface without dismantling parts of the washing appliance; and transmitting the at least one program sequence into the programmable control module through the interface.

In conventional household washing appliances, especially in a dishwasher, one or more rinsing processes using heated rinsing liquid are usually carried out in the course of the rinsing operation in order to clean the items to be washed. After the last rinsing process, a clear rinsing phase is usually carried out, followed by a drying process to dry the items to be washed. These and many other operating modes are combined in specific rinsing program sequences matched to the type and quantity of items to be washed. The rinsing program sequences are usually controlled by an electronic program controller wherein a plurality of rinsing program sequences is usually stored in the electronic components thereof.

These program controllers are frequently obtained by the appliance manufacturer via suppliers in the form of program control modules in which the desired rinsing program sequences are already pre-programmed. After installing the program control module in the appliance, it is no longer possible to subsequently program the program controller or change the rinsing program sequences pre-programmed in the program controller. Or, this can only be done with considerable effort because it is necessary to dismantle significant parts of the dishwasher

or the program controller must be removed because the program controller is located in an interior location of the appliance.

The present invention addresses and solves this problem by providing an electronic program controller for controlling rinsing program sequences such that the controller includes a programmable control module having an interface for programming at least one rinsing program sequence and being configured such that programming of the program controller can be carried out without dismantling parts of the household appliance.

In an exemplary embodiment, the programmable control module is located adjacent to an outside wall of the appliance and the interface for programming the control module can be contacted from outside the appliance.

#### The Park Reference

The Office Action rejects claims 13, 15-18 and 22 under 35 U.S.C. 102(b) as allegedly being anticipated by Park et al. (WO 02/12610 A1). Applicants traverse this rejection.

The applied reference does not teach or suggest the features of the claimed invention including 1) an electronic program controller for controlling rinsing program sequences (claim 13); 2) a programmable control module including electronic components and at least one microprocessor and/or memory means (claim 17); 3) a programmable control module containing an operating system for programming the control module (claim 18); 4) at least one electrical connection for the electrical connection of the programmable control module with the appliance, the electrical connection being embodied as a group plug with a plurality of electrical contacts (claim 22); and 5) a programmable control module located adjacent to the interface, and the programmable control module and the interface are located at a rear wall of the washing appliance (claims 27 and 31).

Claim 13 includes the feature of an electronic program controller for controlling rinsing program sequences. In contrast, the controller of Park is not disclosed as controlling rinsing program sequences. Applicants respectfully submit that while Park may disclose “implementation of functions for detecting an amount of laundry, kinds of laundry, and the like,

information on use of the washing machine, and transmission of the information to outside of the washing machine, and functions for receiving a program required for the washing machine from outside of the washing machine....”, Park does not specifically disclose a controller for controlling rinsing program sequences. It is respectfully submitted that nothing in Park teaches or suggests controlling rinsing program sequences.

Claim 14 includes the feature of the household appliance being a dishwasher. In contrast, the appliance of Park is a washing machine for washing clothes.

Claim 17 includes the feature of the programmable control module including electronic components and at least one microprocessor and/or memory means. Applicants respectfully submit that Park does not mention any microprocessor or memory means. Further, claim 17 is amended to remove “preferably” to further ensure that the “one microprocessor and/or memory means” language will not be regarded as optional and will be regarded as structural limitations to the claim language.

Claim 18 includes the feature of the programmable control module containing an operating system for programming the control module. Applicants respectfully submit that Park does not disclose any operating system used for programming. Further, Park does not disclose the location of any operating system used for programming. Further still, Park does not disclose a programmable control module containing an operating system for programming the control module.

The Office Action states that one of ordinary skill in the art looking at Park would understand that the circuit board which receives information via the connection port further includes a program to determine the wash cycle of the washing machine. Applicants disagree with this statement. Circuit boards are used for many different things and many circuit boards do not include programs. Even if Park had shown a program to determine the wash cycle of the washing machine, there is nothing in Park that says that such a program resides on the circuit board. Such a program could reside at a different location in the machine. But more importantly, claim 18 states “the programmable control module contains an operating system for programming the control module”, not a program to determine the wash cycle (which the

Examiner cites Park as showing). Park does not mention an operating system for programming a control module.

Claim 22 includes the feature of at least one electrical connection being provided for the electrical connection of the programmable control module with the appliance, which is embodied as a group plug with a plurality of electrical contacts. Applicants respectfully submit that Park does not show or discuss how a programmable control module is electrically connected to an appliance. The Office Action considers the circuit board 20 of Park to be a programmable control module. First of all, applicants disagree with the assertion that circuit board 20 is a programmable control module. Further, Park does not show or discuss how circuit board 20 is electrically connected to the washing machine. Specifically, Park does not show or state that circuit board 20 is electrically connected to the washing machine by a group plug with a plurality of electrical contacts. There is no reason to think that circuit board 20 is not hardwired to the washing machine because it is not stated that circuit board 20 is designed to be easily removable.

In view of the foregoing, Applicants respectfully submit that Park does not disclose each and every feature of Claims 13, 15-18 and 22 and respectfully request withdrawal of the rejection.

#### The Oyler Reference in view of the Park Reference

The Office Action rejects claims 13, 14 and 24 under 35 U.S.C. 103(a) over U.S. Patent Application Publication No. 20030205954 to Oyler et al. in view of Park. Applicants traverse this rejection.

As explained above, the Park reference does not teach or suggest the feature of an electronic program controller for controlling rinsing program sequences. The Oyler reference does not remedy the deficiencies of the Park reference.

Indeed, the Examiner does not allege that the Oyler reference teaches or suggests the feature of an electronic program controller for controlling rinsing program sequences as recited in independent claim 13.

Claim 24 includes the feature of the programmable control module being located in a bottom tray of the dishwasher. In contrast, the Oyler reference is directed to a dishwasher door assembly. In every one of the extensive number of instances that Oyler mentions a control panel or a control mount surface (in almost every paragraph of the application), the control panel or control mount surface is located in the door of the dishwasher. Applicants respectfully submit that in light of the clear teaching by Oyler that a control panel and/or control mount surface is to be located in a door of a dishwasher, placing a controller in a bottom tray of a dishwasher is not an obvious design choice.

As stated in the Office Action, “Oyler in view of Park do not teach that the programmable control module is located in a bottom tray of the dishwasher.” The Office Action uses impermissible hindsight construction in further stating that the placement of the controller in a bottom tray of a dishwasher is a matter of obvious engineering choice.

“In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious.” (Emphasis original, M.P.E.P. 2141.02.I.)

“To reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical ‘person of ordinary skill in the art’ when the invention was unknown and just before it was made. In view of all factual information, the examiner must then make a determination whether the claimed invention ‘as a whole’ would have been obvious at that time to that person. Knowledge of applicant’s disclosure must be put aside in reaching this determination, yet kept in mind in order to determine the ‘differences,’ conduct the search and evaluate the ‘subject matter as a whole’ of the invention. The tendency to resort to ‘hindsight’ based upon applicant’s disclosure is often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of facts gleaned from the prior art.” (Emphasis added, M.P.E.P. § 2142).

In the present instance, the Office Action relies on the teachings of the present

application to see the benefits associated with placing a programmable control module in a bottom tray of a dishwasher. If such a feature is an obvious engineering choice, then it is respectfully submitted that a prior art reference showing this feature would be readily available, and should be applied (M.P.E.P. §2144.03).

In addition, even if one was to add the feature of a programmable control module that can be contacted from outside the dishwasher to the dishwasher shown in Oyler, why wouldn't one locate an access port on the upper portion of the door adjacent to the location of the control panel?

In view of the foregoing, Applicants respectfully submit that the combination of Oyler and Park does not suggest the features of Claims 13, 14 and 24 and respectfully requests withdrawal of this rejection.

The Park Reference in view of the Anderson Reference

The Office Action rejects claim 19 under 35 U.S.C. 103(a) over Park in view of U.S. Patent No. 5,917,690 to Anderson. Applicants traverse this rejection.

As explained above, the Park reference does not teach or suggest the feature of an electronic program controller for controlling rinsing program sequences. The Anderson reference does not remedy the deficiencies of the Park reference.

Indeed, the Examiner does not allege that the Anderson reference teaches or suggests the feature of an electronic program controller for controlling rinsing program sequences as recited in independent claim 13.

Also, Applicants respectfully submit that the Anderson reference is not available to the Examiner for use in a rejection because the Anderson reference is clearly non-analogous art. “[A] prior art reference must either be in the field of applicant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the applicant was concerned, in order to be relied upon as a basis for rejection of the claimed invention. See *In re Oetiker*” (emphasis original, M.P.E.P. § 707.07(f)). The Anderson reference is neither within the field of Applicants’

endeavor nor reasonably pertinent to the particular problem with which the Applicant was concerned.

The field of applicant's endeavor is the household washing appliance art. In stark contrast, the field of endeavor of the Anderson reference is the cable signal distribution art. One of ordinary skill in the art who is in the field of the household washing appliance art would not have been familiar with, nor have looked to the Anderson reference because the Anderson reference is directed to the completely different and unrelated field of cable signal distribution. The Anderson reference is not within the field of Applicants' endeavor.

The Anderson reference is also not reasonably pertinent to the particular problem with which the Applicant was concerned. As clearly explained by the specification at, for example, page 1, lines 29-32, the Applicants were concerned with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance. In stark contrast, the Anderson reference is concerned with the completely different and unrelated problem of limiting current in a power supply (col. 1, lines 11-13). One of ordinary skill in the art who was concerned with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance as the Applicants were concerned would not have referred to the Anderson reference because it is directed to the completely different and unrelated problem of limiting current in a power supply. Indeed, the Anderson reference has absolutely nothing to do with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance. Thus, the Anderson reference is not reasonably pertinent to the particular problem with which the Applicant was concerned.

Applicants respectfully submit that the Anderson reference is neither within the field of Applicants' endeavor nor reasonably pertinent to the particular problem with which the Applicant was concerned and, as such, is non-analogous art and therefore, unavailable for use in rejecting the claims.

Indeed, the citation of the Anderson reference is a clear case of the use of impermissible hindsight reconstruction.



“In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious.” (Emphasis original, M.P.E.P. 2141.02.I.)

“To reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical ‘person of ordinary skill in the art’ when the invention was unknown and just before it was made. In view of all factual information, the examiner must then make a determination whether the claimed invention ‘as a whole’ would have been obvious at that time to that person. Knowledge of applicant’s disclosure must be put aside in reaching this determination, yet kept in mind in order to determine the ‘differences,’ conduct the search and evaluate the ‘subject matter as a whole’ of the invention. The tendency to resort to ‘hindsight’ based upon applicant’s disclosure is often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of facts gleaned from the prior art.” (Emphasis added, M.P.E.P. § 2142).

In the present instance, the Examiner clearly did not locate the Anderson reference during a search for relevant art that was within the field of applicants’ endeavor or reasonably related to the particular problem which the applicants were concerned. Rather than viewing the invention as a whole as required, the claim was dissected to focus only upon the power supply input filter and the Examiner resorted to the use of hindsight in an attempt to locate anything that was related to a power supply filter. This was done likely through a keyword search. Regardless of the difficulty of avoiding hindsight, it is clear that impermissible hindsight is the only explanation for locating the non-analogous art of the Anderson reference.

In view of the foregoing, Applicants respectfully submit that the combination of Park and Anderson does not suggest the features of Claim 19 and requests withdrawal of this rejection.

#### The Park Reference in view of the Wattrick Reference

The Office Action rejects claims 20 and 21 under 35 U.S.C. 103(a) over Park in view of

U.S. Patent No. 5,915,851 to Wattrick et al. Applicants traverse this rejection.

As explained above, the Park reference does not teach or suggest the feature of an electronic program controller for controlling rinsing program sequences. The Wattrick reference does not remedy the deficiencies of the Park reference.

Indeed, the Examiner does not allege that the Wattrick reference teaches or suggests the feature of an electronic program controller for controlling rinsing program sequences as recited in independent claim 13.

Also, Applicants respectfully submit that the Wattrick reference is not available to the Examiner for use in a rejection because the Wattrick reference is clearly non-analogous art. “[A] prior art reference must either be in the field of applicant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the applicant was concerned, in order to be relied upon as a basis for rejection of the claimed invention. See *In re Oetiker*” (emphasis original, M.P.E.P. § 707.07(f)). The Wattrick reference is neither within the field of Applicants’ endeavor nor reasonably pertinent to the particular problem with which the Applicant was concerned.

The field of applicant’s endeavor is the household washing appliance art. In stark contrast, the field of endeavor of the Wattrick reference is the bath, closets, sink, and spittoons art. One of ordinary skill in the art who is in the field of the household washing appliance art would not have been familiar with, nor have looked to the Wattrick reference because the Wattrick reference is directed to the completely different, and unrelated field of sinks. The Wattrick reference is not within the field of Applicants’ endeavor.

The Wattrick reference is also not reasonably pertinent to the particular problem with which the Applicant was concerned. As clearly explained by the specification at, for example, page 1, lines 29-32, the Applicants were concerned with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance. In stark contrast, the Wattrick reference is concerned with the completely different and unrelated problem of providing convenient work areas and accessories for improving efficiency of labor in a food preparation area (col. 1, lines 24-26). One of ordinary skill in the art

who was concerned with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance as the Applicants were concerned would not have referred to the Wattrick reference because it is directed to the completely different and unrelated problem of providing convenient work areas and accessories for improving efficiency of labor in a food preparation area. Indeed, the Wattrick reference has absolutely nothing to do with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance. Thus, the Wattrick reference is not reasonably pertinent to the particular problem with which the Applicant was concerned.

Applicants respectfully submit that the Wattrick reference is neither within the field of Applicants' endeavor nor reasonably pertinent to the particular problem with which the Applicant was concerned and, as such, is non-analogous art and therefore, unavailable for use in rejecting the claims.

Indeed, the citation of the Wattrick reference is a clear case of the use of impermissible hindsight reconstruction.

"In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious." (Emphasis original, M.P.E.P. 2141.02.I.)

"To reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made. In view of all factual information, the examiner must then make a determination whether the claimed invention 'as a whole' would have been obvious at that time to that person. Knowledge of applicant's disclosure must be put aside in reaching this determination, yet kept in mind in order to determine the 'differences,' conduct the search and evaluate the 'subject matter as a whole' of the invention. The tendency to resort to 'hindsight' based upon applicant's disclosure is often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight must be avoided and the

legal conclusion must be reached on the basis of facts gleaned from the prior art.” (Emphasis added, M.P.E.P. § 2142).

In the present instance, the Examiner clearly did not locate the Wattrick reference during a search for relevant art that was within the field of applicants’ endeavor or reasonably related to the particular problem which the applicants were concerned. Rather than viewing the invention as a whole as required, the claim was dissected to focus only upon the power/interface plug and the Examiner resorted to the use of hindsight in an attempt to locate anything that was related to an electrical plug. This was done likely through a keyword search. Regardless of the difficulty of avoiding hindsight, it is clear that impermissible hindsight is the only explanation for locating the non-analogous art of the Wattrick reference.

Further, even if the Wattrick reference were available for use in rejecting the claims, Wattrick does not teach or suggest the features of claims 20 and 21. Applicants respectfully submit that the electrical plug connector 229 of Wattrick simply connects the control module 61 to the utilities module 130 (col. 6, lines 39-41). Wattrick does not state that electrical plug connector 229 is a connector for the power supply of both a programmable control module and an appliance, as required by claims 20 and 21. It appears (although it is not clear) that the power supply to the sink unit in Wattrick is located in the vicinity of access door 132 (Fig.3, col. 5, lines 1-3).

Regarding claim 21, the Office Action asserts that claim 21 claims an intended use. Applicants disagree. However, in the interest of expediting prosecution, claim 21 is amended to more positively recite structure of the claim features.

Claim 21 includes the feature of a primary power plug connector positioned adjacent to an interface for external programming of the programmable control module so that the primary power plug connector and the interface for external programming of the programmable control module are adapted to be contacted via a combination plug connector in which both a complementarily constructed counterpart to the primary power plug connector and also a complementarily constructed counterpart to the interface are combined to form a unit.

In contrast, Wattrick does not teach or suggest a primary power plug connector adjacent

to an interface for external programming.

In view of the foregoing, Applicants respectfully submit that the combination of Park and Wattrick does not suggest the features of Claims 20 and 21 and request withdrawal of this rejection.

The Park Reference in view of the Harrison Reference

The Office Action rejects claim 23 under 35 U.S.C. 103(a) over Park in view of U.S. Patent Application Publication No. 20020131243 to Harrison et al. Applicants respectfully traverse this rejection.

As explained above, the Park reference does not teach or suggest the feature of an electronic program controller for controlling rinsing program sequences. The Harrison reference does not remedy the deficiencies of the Park reference.

Indeed, the Examiner does not allege that the Harrison reference teaches or suggests the feature of an electronic program controller for controlling rinsing program sequences as recited in independent claim 13.

Also, Applicants respectfully submit that the Harrison reference is not available to the Examiner for use in a rejection because the Harrison reference is clearly non-analogous art. “[A] prior art reference must either be in the field of applicant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the applicant was concerned, in order to be relied upon as a basis for rejection of the claimed invention. See *In re Oetiker*” (emphasis original, M.P.E.P. § 707.07(f)). The Harrison reference is neither within the field of Applicants’ endeavor nor reasonably pertinent to the particular problem with which the Applicant was concerned.

The field of applicant’s endeavor is the household washing appliance art. In stark contrast, the field of endeavor of the Harrison reference is the electrical contacts art. One of ordinary skill in the art who is in the field of the household washing appliance art would not have been familiar with, nor have looked to the Harrison reference because the Harrison reference is

directed to the completely different, and unrelated field of electrical contacts. The Harrison reference is not within the field of Applicants' endeavor.

The Harrison reference is also not reasonably pertinent to the particular problem with which the Applicant was concerned. As clearly explained by the specification at, for example, page 1, lines 29-32, the Applicants were concerned with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance. In stark contrast, the Harrison reference is concerned with the completely different and unrelated problem of overheating in circuit board connections (paragraphs 0005 and 0006). One of ordinary skill in the art who was concerned with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance as the Applicants were concerned would not have referred to the Harrison reference because it is directed to the completely different and unrelated problem of overheating in circuit board connections. Indeed, the Harrison reference has absolutely nothing to do with the problem of programming or reprogramming rinsing program sequences in a program controller in a household washing appliance. Thus, the Harrison reference is not reasonably pertinent to the particular problem with which the Applicant was concerned.

Applicants respectfully submit that the Harrison reference is neither within the field of Applicants' endeavor nor reasonably pertinent to the particular problem with which the Applicant was concerned and, as such, is non-analogous art and therefore, unavailable for use in rejecting the claims.

Indeed, the citation of the Harrison reference is a clear case of the use of impermissible hindsight reconstruction.

"In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious." (Emphasis original, M.P.E.P. 2141.02.I.)

"To reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the

invention was unknown and just before it was made. In view of all factual information, the examiner must then make a determination whether the claimed invention ‘as a whole’ would have been obvious at that time to that person. Knowledge of applicant’s disclosure must be put aside in reaching this determination, yet kept in mind in order to determine the ‘differences,’ conduct the search and evaluate the ‘subject matter as a whole’ of the invention. The tendency to resort to ‘hindsight’ based upon applicant’s disclosure is often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of facts gleaned from the prior art.” (Emphasis added, M.P.E.P. § 2142).

In the present instance, the Examiner clearly did not locate the Harrison reference during a search for relevant art that was within the field of applicants’ endeavor or reasonably related to the particular problem which the applicants were concerned. Rather than viewing the invention as a whole as required, the claim was dissected to focus only upon the connection of claim 23 and the Examiner resorted to the use of hindsight in an attempt to locate anything that was related to an electrical connection. This was done likely through a keyword search. Regardless of the difficulty of avoiding hindsight, it is clear that impermissible hindsight is the only explanation for locating the non-analogous art of the Harrison reference.

In view of the foregoing, it is respectfully submitted that the combination of Park and Harrison does not suggest the features of Claim 23 and therefore rejection under 35 USC §103(a) is inappropriate. As a result, it is respectfully requested that the rejection be withdrawn.

#### New Claims

New Claims 25-32 are added. Applicants respectfully submit that none of the applied references teaches or suggests the features of claims 25-32.

**CONCLUSION**

In view of the above, entry of the present Amendment and allowance of Claims 13-32 are respectfully requested. If the Examiner has any questions regarding this amendment, the Examiner is requested to contact the undersigned. If an extension of time for this paper is required, petition for extension is herewith made.

Respectfully submitted,

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